PROJECT SPECIFIC PLAN FOR PREDESIGN SAMPLING IN THE AREA 2, PHASE I NON-WASTE UNITS AND AREA 2, PHASE II - PART ONE

SOIL AND DISPOSAL FACILITY PROJECT

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT FERNALD, OHIO



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U.S. DEPARTMENT OF ENERGY FERNALD AREA OFFICE

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FERNALD ENVIRONMENTAL MONITORING PROJECT

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LIST OF ACRONYMS AND ABBREVIATIONS

A2PI Area 2, Phase I A2PII Area 2, Phase II **AFP** Active Flyash Pile **APM** Area Project Manager

ASCOC area-specific constituent of concern

ASL analytical support level

CERCLA Comprehensive Environmental Response, Compensation and Liability Act

COC constituent of concern

CRDL contract required detection limits

disintegrations per minute dpm **Data Quality Objectives** DOO

ECDC Engineering/Construction Document Control

FDF Fluor Daniel Fernald

Fernald Environmental Management Project **FEMP**

FRL final remediation level **GPS** global positioning system **HPGe** high-purity germanium detector

Inductively Coupled Plasma/Mass Spectrometry ICP/MS

IFP Inactive Flyash Pile LAN Local Area Network

MDC minimum detectable concentration

NISP Non-Impacted Soil Pile

NWUs Non-Waste Units

On-Site Disposal Facility **OSDF**

OU₂ Operable Unit 2 OU5 Operable Unit 5 picoCuries per gram pCi/g ppm parts per million Project Specific Plan **PSP** OA **Ouality Assurance**

Remedial Investigation/Feasibility Study RI/FS

RMS Radiation Measurement System Radiation Scanning System RSS

RTIMP Real-Time Instrumentation Measurement Program

RTRAK Real-Time Radiation Tracking System **SDFP** Soil and Disposal Facility Project

SCO Sitewide CERCLA Quality Assurance Project Plan

SED Sitewide Environmental Database

Sitewide Excavation Plan SEP

South Field SF

SSOD Storm Sewer Outfall Ditch **SWUs** Southern Waste Units TAL Target Analyte List

Variance/Field Change Notice V/FCN Waste Acceptance Criteria WAC WAO Waste Acceptance Organization

1.0 INTRODUCTION

1.1 PURPOSE

The purpose of this project specific plan (PSP) is to provide details of the predesign sampling and real-time data collection activities to be conducted along the perimeter of the Southern Waste Units (SWUs). In addition, this PSP will identify discrete areas of partially-buried construction debris delineate the estimated depth of flyash contamination. The SWUs include the Inactive Flyash Pile (IFP), South Field (SF), and Active Flyash Pile (AFP). Their locations at the Fernald Environmental Monitoring Project (FEMP) are depicted in Figure 1-1. This investigation area includes the remainder of Area 2, Phase I (A2PI) that was not included in the SWUs [i.e., known as the A2PI Non-Waste Units (NWUs)], and the extreme southern portion of Area 2, Phase II (A2PII) which lies upgradient from A2PI and has been designated as A2PII Part One (Figure 1-2). The equipment wash facility, which is currently in use within the A2PI NWU area, will be excluded from scanning and sampling in this predesign PSP.

Excavation will be necessary to remediate areas with partially-buried construction debris. Excavation is also expected under the non-impacted soil pile (the current turn-around area) due to observations of flyash during site preparation. Sampling/real-time data collection activities are necessary to help determine if further excavation is needed in the perimeter areas around the SWUs. Further excavation in areas without obvious, visible construction debris and/or flyash material will be required if either of the following conditions exist:

- Sampling/real-time results indicate soil or soil-like material has contamination levels exceeding final remediation levels (FRLs)
- Visual examination of the soil cores indicate that flyash or other impacted material is still present.

The data collected will also be used to determine the appropriate disposition of the material (e.g., disposition in the On-Site Disposal Facility (OSDF) if the waste acceptance criteria (WAC) are attained).

1.2 BACKGROUND

The A2PI NWUs and A2PII Part One areas are adjacent areas in the southwestern portion of the FEMP, surrounding the SWUs of Operable Unit 2 (OU2), and include a portion of the Operable Unit 5 (OU5) soils. Within the SWUs, various waste materials, including flyash, building rubble, gravel, asphalt, drums, and process waste may have been randomly dumped between the 1950s and 1980s. The surface features and area topography are depicted in Figure 1-3.

Based on interviews with construction personnel involved with the installation of a box culvert in the storm sewer outfall ditch (SSOD) and SWU excavation site preparation, a walkdown of the investigation area along the SSOD and Paddys Run creek was conducted. Partially-buried construction debris (concrete rubble, bricks, cinder blocks, rebar, etc.) is present in specific areas. Although a review of historical aerial photographs does not provide conclusive evidence of disposal activities, the presence of visible debris and disturbed soil is evident. The areas identified in Figure 1-4 with visible construction debris (impacted material) within the investigation area, Paddys Run and the SSOD, will require remediation regardless of additional scanning and sampling data. The suspect disposal area between Basins 2 and 3 and the SSOD and Paddys Run will be further investigated in this PSP with magnetometer surveys, physical sampling, real-time in situ gamma spectroscopy, and possibly other field techniques such as trenching or ground penetrating radar.

Soil sampling/analysis projects have been conducted in the past within and around this investigation area, including a Characterization Investigation Study conducted by the Roy F. Weston Company, the OU2 and OU5 Remedial Investigation/Feasibility Studies (RI/FS), Predesign Investigations for Site Preparation (20401-PSP-0001), Above-WAC Delineation (20400-PSP-0001), and Lead Delineation in the Firing Range (20402-PSP-0001).

Data queries were retrieved from the Sitewide Environmental Database (SED) to identify sample locations that exhibited contamination levels greater than the FRLs. The locations of these above-FRL samples identified in the data query, along with the results, are plotted in Figure 1-5. Note there were no sample locations with technetium-99 concentrations above-FRL.

A review of the mapped data shows five samples with above-FRL estimated concentrations for n-nitroso-di-n-propylamine. These results are not conclusive about the presence of this organic compound because the validated above-FRL n-nitroso-di-n-propylamine estimated values are the result of contract required detection limits (CRDLs) which are greater than the FRL. Review of the data packages shows that these samples were diluted per method by the subcontractor laboratory, effectively raising the CRDL above the FRL concentrations. It should be noted that the soil FRLs were established after receipt of the analytical report with the high CRDLs, and the samples taken in 1989 and 1993 were no longer available for re-analysis. While these data are inconclusive with respect to exceeding FRLs, process knowledge and disposal practices indicate these organic compounds are not likely to be found in this predesign study area. Based on this information, organic compounds will not be retained as area-specific constituents of concern (ASCOCs). Additional investigation of these samples will not occur under this PSP.

Samples 121033 and 200058 have beryllium and arsenic results, respectively, slightly above-FRL. The beryllium result for sample 121033 was 1.7 parts per million (ppm), while the FRL for beryllium is 1.5 ppm. The arsenic result for sample 200058 was 12.3 ppm, while the FRL for arsenic is 12.0 ppm. Since the results are very close to the FRL limits and this area will undergo extensive sampling for certification, these sample points will not be bounded in this PSP. However, additional sample points have been placed in these areas to help determine the extent of impacted material.

Two samples (055446 and 055476) south of Basin 2 have thorium-232 and/or thorium-228 results greater than the FRL. Sample 055446 has a contamination depth of 16.5-17 feet, while 055476 has a depth of 11-11.5 feet. Samples 055446 and 055476 were collected from borings 21192 and 21193, respectively, and the data are summarized in the OU5 RI/FS. Over fifteen other samples were collected from each of these borings to a depth of over 19.5 feet. All other samples analyzed exhibited below-FRL concentrations for isotopic thorium as well as other constituents of concern (COCs). The possible sources of the elevated thorium concentrations at 055446 and 055476 are vertical migration of contaminated perched water, cross contamination of the sample, laboratory error, or mislabeling of samples (OU5 RI/FS). Due to this uncertainty, only the highest isotopic thorium sample location (055476) will be investigated further in this PSP.

Ten samples, clustered south of Basin 3, exhibited above-FRL values for radium-226 and thorium-232. The depth of contamination for the ten clustered samples is within 1 foot of the surface. Although all of the results are non-validated and two are non-detects, the frequency and proximity of these

above-FRL locations warrants further investigation. In this PSP, further investigation of these areas will involve sampling near the same locations and depth intervals, with some samples bounding the potential contamination. This process is described in Section 2.2.1. Further investigation beneath Basin 3 is not possible at this time to avoid breaching the basin liner.

During the A2PI site preparation activities, three special material locations were identified as having elevated beta-gamma counts, visual evidence of product material, and/or soil discoloration. They are located in the following areas shown on Figure 1-2:

Area A The current parking area for dump trucks (covered with rip-rap), located just south of the cool-down trailer

Area B South of Basin 3, next to the concrete pad that holds the electrical panels

Area C Northeast of the AFP where the ditch lined with rip-rap meets the storm sewer outfall ditch tree line.

For Areas A and B, the contaminated material was removed and placed in white metal boxes. However, confirmation of complete excavation of the material in the ditch area northeast of the AFP was not possible due to the steepness of the terrain (Figure 1-2, Area C). Samples and real-time measurements will be collected in these areas to further investigate other potentially contaminated material.

1.3 SCOPE

This PSP covers all predesign data collection activities associated with predesign in the A2PI NWUs and A2PII Part One. It supplements previous predesign investigations and does not address certification sampling. Fifty-three boring locations have initially been selected along the perimeter of the SWUs for radiological field frisking, lithological determination and potential submittal for radiological analysis. Portions of this perimeter area will be scanned with the magnetometer and real-time *in situ* radiation measurement systems (RMS). All data collection activities will be consistent with the Sitewide Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Quality Assurance Plan (SCQ) and Section 3.1 of the Sitewide Excavation Plan (SEP). Physical samples will be collected in accordance with Data Quality Objectives (DQO) SL-048, Rev. 5 (Appendix A). Real-time data collection activities will be in accordance with DQO SL-056, Rev. 0 (Appendix A). The data will be utilized to assess whether COC concentrations in these areas are lower

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than the FRLs outlined in the OU5 Record of Decision. The data collected under this plan will also be utilized to determine whether soil and soil-like material from the area meet the WAC as defined in the SEP, the WAC Attainment Plan for the OSDF, and the Impacted Materials Placement Plan. All sampling activities and characterization data collection activities will conform to the requirements of the documents listed in Section 7.0.

1.4 <u>KEY PERSONNEL</u>

Personnel responsible for conducting work in accordance with this PSP are listed in Table 1-1.

TABLE 1-1 KEY PERSONNEL

TITLE	PRIMARY	ALTERNATE
DOE Contact	Robert Janke	Kathi Nickel
Area 2 Project Manager	Tom Crawford	Jyh-Dong Chiou
Area 2 Characterization Lead	Mike Rolfes	John Centers
Real-Time Instrumentation Measurement Program (RTIMP) Manager	Joan White	Dave Allen
RTIMP Field Lead	Brian McDaniel	Dale Seiller
Field Sampling Lead	Mike Frank	Tom Buhrlage
Surveying Lead	Jim Schwing	Jim Capannari
Data Management Lead	Deanna Diallo	Jeff Maple
Data Validation Contact	Jim Chambers	Jim Cross
Laboratory Contact	Audrey Hannum	Denise Arico
Safety and Health Contact	Lewis Wiedeman	Debra Grant
Radiological Control Contact	Corey Fabricante	Dan Stempfley
Quality Assurance Contact	Reinhard Friske	Ervin O'Bryan
Waste Acceptance Organization (WAO) Contact	Linda Barlow	To Be Determined

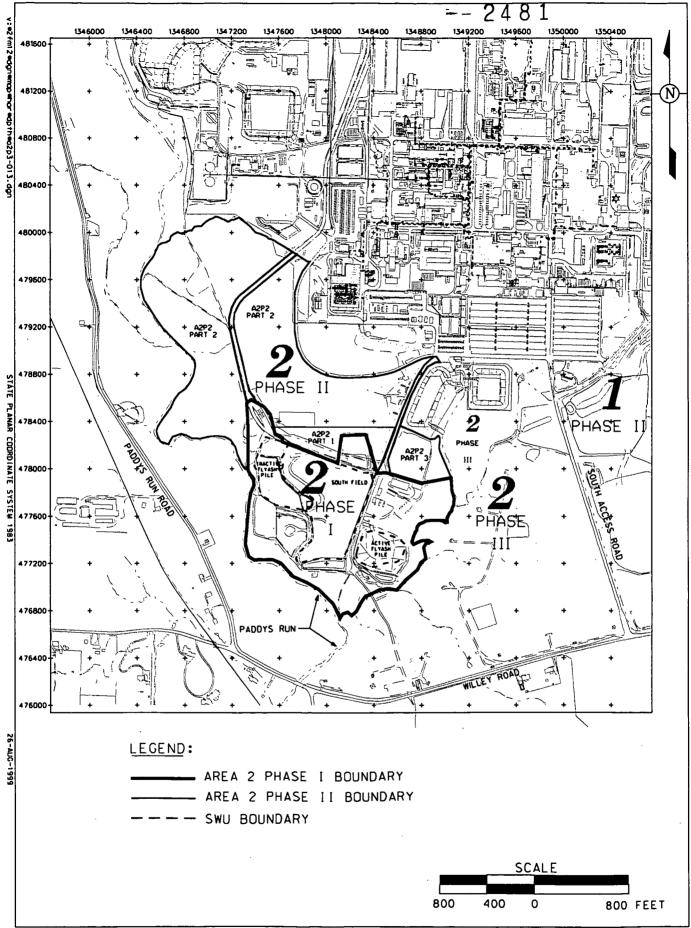


FIGURE 1-1. A2PI/A2PII LOCATION MAP

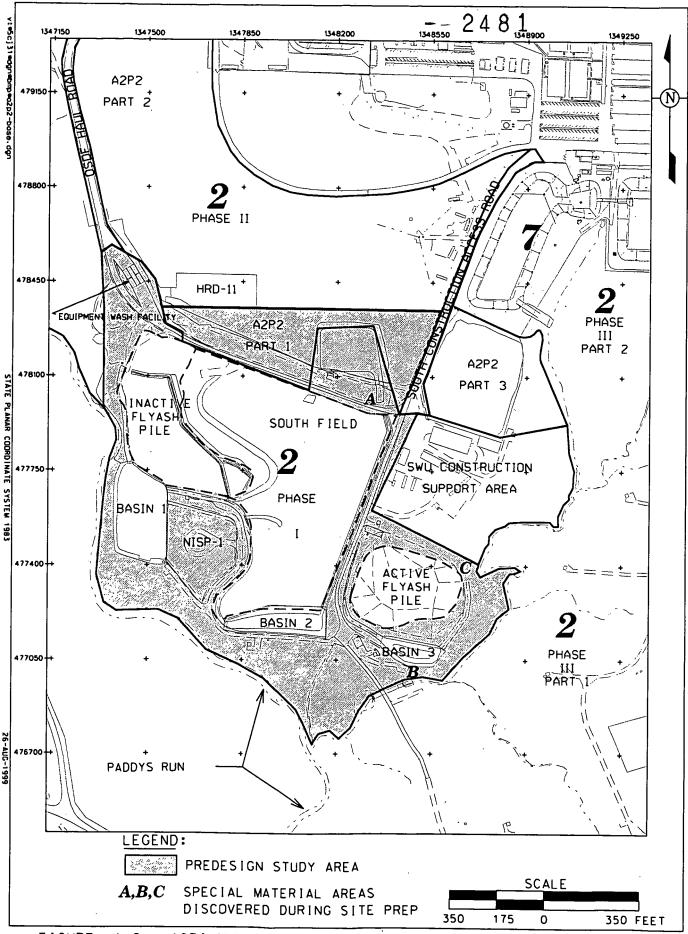


FIGURE 1-2. A2PI-NWU/A2PII PART ONE PREDESIGN INVESTIGATION ZONE

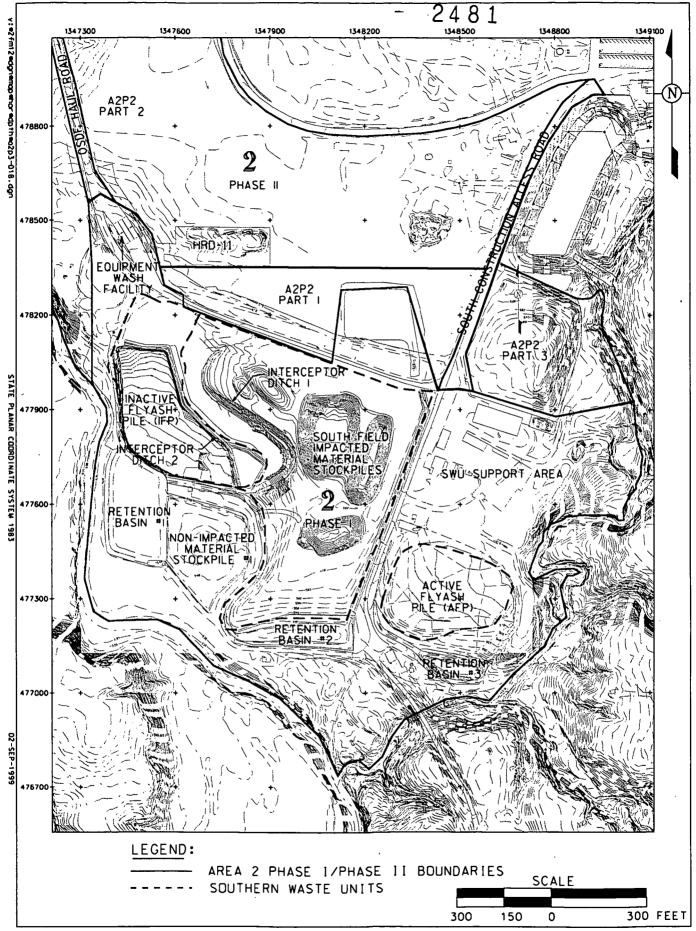
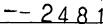


FIGURE 1-3. A2PI-NWU/A2PII PART ONE TOPOGRAPHY/SURFACE FEATURES 00013



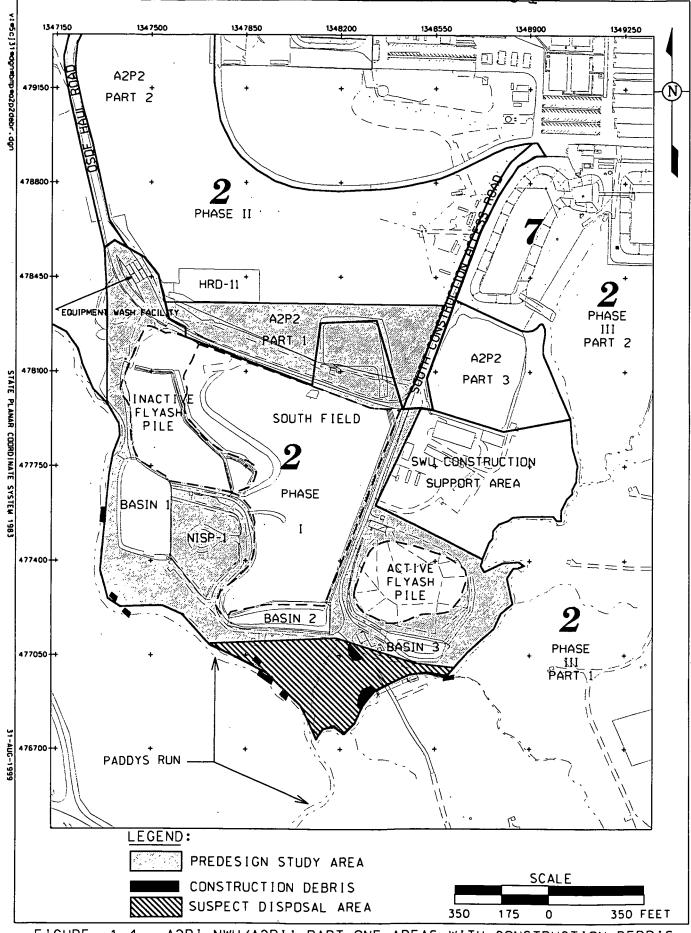


FIGURE 1-4. A2PI-NWU/A2PII PART ONE AREAS WITH CONSTRUCTION DEBRIS

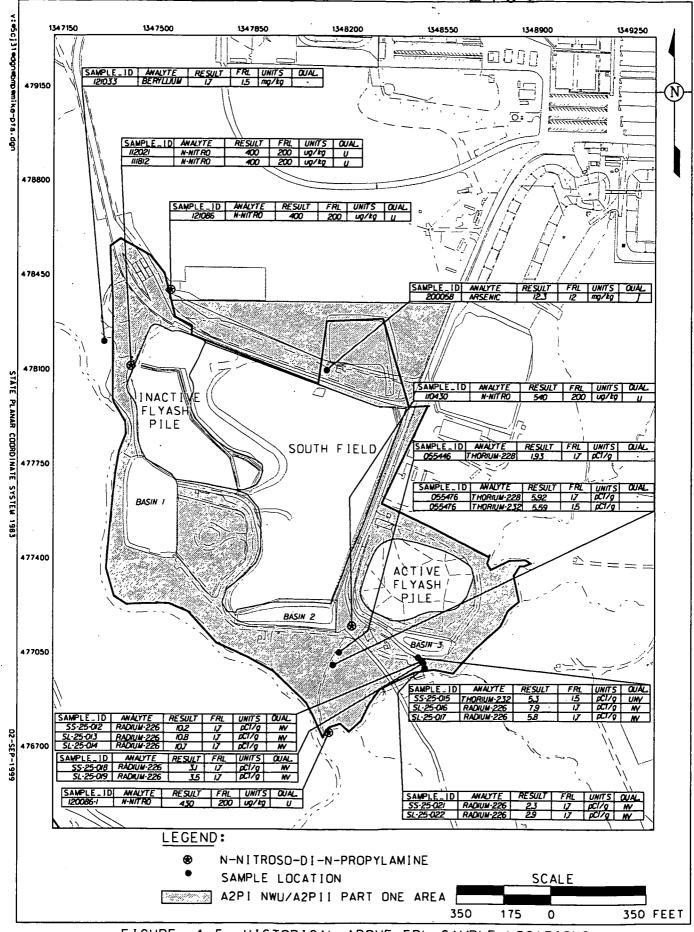


FIGURE 1-5. HISTORICAL ABOVE-FRL SAMPLE LOCATIONS

2.0 FIELD ACTIVITY

2.1 SAMPLE LOCATIONS AND MAGNETIC SURVEY SCANS

The sampling locations will be marked by the Fluor Daniel Fernald (FDF) Surveying and Mapping group. Northing (Y), easting (X), and elevation (Z) coordinate values (NAD83, Ohio South Zone, #3402) will be determined using standard survey practices and equipment [electronic total stations and Global Positioning System (GPS) receivers]. Field locations will be marked in a manner easily identifiable by all field personnel using survey stakes or flags. Survey information (coordinate data) will be downloaded at the completion of each survey job or at the end of each day and transferred electronically to the Survey Lead. This information will be forwarded to the Characterization Lead or Data Management Contact or designee.

Ferro-magnetic surveys will also be conducted by the FDF Surveying and Mapping group in the suspect disposal area denoted in Figure 1-4. This surveying will consist of scanning the surface of the soil and exposed debris with a magnetometer to assist in detection of ferrous bearing materials (metal drums, rebar, etc.). Depending on the size of the buried object, the magnetometer can detect to depths of 10 feet and below. The boundaries of areas with elevated magnetometer readings will be marked in a manner easily identifiable by all field personnel, such with stakes or flags. Survey coordinates will be collected to delineate the area for potential further investigation such as trenching or ground penetrating radar. Any additional field investigation will be documented with a Variance/Field Change Notice (V/FCN).

2.2 PHYSICAL SAMPLE COLLECTION

Forty-six locations will be sampled in A2PI along the western, southern and eastern perimeters surrounding the IFP, SF and the AFP. Seven locations in A2PII Part One, just north of the IFP and SF excavation boundaries, will also be sampled. The 53 boring locations are shown in Figure 2-1 and are listed with identification numbers in Table 2-1. Boring locations were designed to determine the extent of impacted material (if any) around the perimeter of the SWUs. Additionally, some borings were placed south of Basins 2 and 3 to bound the above-FRL isotopic radium and thorium locations that were discovered during previous investigations. Placement of borings around the vehicle turnaround area [formerly known as Non-Impacted Soil Pile (NISP) 1] were chosen to delineate the depth of flyash observed during site preparation and to assist in the cross-sectional determination of

remediation depth beneath the vehicle turnaround area. Pockets of flyash are anticipated beneath the vehicle turnaround area to a depth of at least 18 inches based on site preparation and IFP excavation process knowledge.

The estimated depth for each boring varies depending on the topography and the amount of fill material expected. The depth for each boring (see Table 2-1) was estimated based on process knowledge along with overlaying a 1952 topographical map with a current topographical map and calculating the differences in elevations for any given area.

Additional boring and sample locations may be identified by the Characterization Lead or designee based on results of real-time field measurement and analytical data. All boring and sample additions and/or field modifications will be documented in a V/FCN. Samples will be submitted to the FEMP on-site laboratory for analysis of the target analyte lists (TALs) identified in Appendix B.

2.2.1 Sample Collection Methods

Samples will primarily be collected using the Geoprobe Model 5400 and a Macro-core sampler in accordance with procedure EQT-06, Geoprobe Model 5400-Operation and Maintenance. The sampling technicians will remove all existing surface vegetation within an approximate 6-inch radius of the sample point using a stainless steel trowel or clean nitrile gloves, taking care to minimize the removal of any soil. If required, the Geoprobe drill bit will be used to drill through any pavement and/or cement/rock subsurface. At the Field Sampling Lead's discretion, other sampling tools may be utilized (e.g., dual tube sampler) in accordance with environmental monitoring procedures. If Geoprobe accessibility is not possible, the technicians will retrieve the samples using a hand auger, core barrel sampler, or manual Macro-core sampler according to procedure SMPL-01, Solid Sampling. If the boring needs to be relocated to an area more than 3 feet from the original location due to inaccessibility, a V/FCN will be generated and approved. If refusal or resistance is encountered during soil borings, up to two additional borings within a 3-foot radius of the original point may be attempted in order to collect the specified samples. All encounters with subsurface debris will be noted in the field log.

Each boring should be advanced to the estimated depth or until the lithology indicates the boring has advanced through flyash, fill and/or debris and reached native soil. The cores will be laid on clean

plastic, divided into 12-inch depth increments, scanned with a beta-gamma field frisker, then placed into a sample container and labeled. In addition to the beta-gamma frisk, an alpha frisk will be conducted on the soil cores from locations A2P1-NWU-21 (the former 055476 sample location) and A2P1-NWU-26 (the former SS-25-012/SL-25-013/SL-25-014 RI/FS sample location), and their respective boundary borings, due to elevated thorium and radium analytical results detected respectively at these locations during the previous characterization investigations. Bounding samples, designated as A, B, C, and D (one at each of the cardinal compass points from the original boring) will be collected at locations A2P1-NWU-21 and A2P1-NWU-26 shown on Figure 2-1.

Sample intervals exhibiting greater than background counts for beta-gamma activity, and/or 20 disintegrations per minute (dpm) for alpha activity, will be submitted for analysis, including the intervals above and below, to potentially bound the contamination. If no sample intervals in a core exhibit 20 dpm or greater alpha, or greater than background counts for beta-gamma activity, then the first 12-inch interval (surface soil) will be submitted for analysis. Sample intervals from A2P1-NWU-8 through A2P1-NWU-15 will only be submitted for analysis if elevated beta-gamma activity is detected (i.e., greater than background counts). Intervals not submitted for analysis will be discarded after the beta-gamma scan and visual classification is complete [expect for A2P1-NWU-21 and 26 and their respective bounding borings (A,B,C,D) where all intervals will be archived]. The 11-12 foot depth interval for A2P1-NWU-21 and the 0-1 foot depth interval for A2P1-NWU-26 will be submitted for analysis regardless of the beta-gamma scan results.

The visual classification of the soil material (determined by a geologist) as well as the beta-gamma scan results will be recorded on the Visual Classification of Soils log and entered into the database. Gross fragments of construction rubble (e.g., bolts, nails, concrete, wood, metal) will be removed prior to performing the beta-gamma scan and placing each soil interval into a sample container. A description of the removed construction rubble will be recorded in the Visual Classification of Soils log. Gross fragments will be dispositioned with WAO concurrence in accordance with Section 2.2.4.

All field measurements and sample collection information shall be recorded on the Sample Collection Log, the Field Activity Log, and the Chain of Custody/Request for Analysis, as required. All samples will be assigned a unique sample number (see Table 2-1) which shall appear on the Chain of

Custody/Request for Analysis and used to identify the sample during analysis, data entry, and data management.

2.2.2 Sampling Equipment Decontamination

Sampling equipment that comes in contact with the soil sample intervals will be decontaminated by Level II methods prior to transport to the field location, at each cutting shoe change (in the case of the Macro-core sampler) and after sampling under this PSP is completed. If hand augers are used, a Level II decontaminated auger should be used for each one-foot soil interval. Probe rods and other equipment that do not contact the collected soil interval do not require decontamination between sample boring locations. The decontaminated equipment can be dried with clean disposable wipes or air dried.

2.2.3 Borehole Abandonment

Each borehole will be plugged using bentonite pellets immediately after sample collection is completed. Borehole collapse, expected to be minimal in the sampling area, does not pose a significant risk of contaminating deeper zones due to the immediate placement of pellets into the borehole following-soil core collection. Any surface gravel or rock will be replaced with the equal thickness of a similar material. A Borehole Abandonment Log will be completed for each boring location.

2.2.4 Disposition of Wastes

During completion of physical sampling activities, field personnel may generate small amounts of soil, sediment, water, contact waste, or construction rubble that was segregated from soil samples (e.g. bolts, nails, concrete, metal). Management of these waste streams will be coordinated with WAO. WAO will evaluate the sample material (including soil archive samples) and determine the disposition based on analytical data, material type, and location. If sample material is below-WAC, the material may be placed near the sample location. Any Category 2 material may be placed in an existing Category 2 pile for OSDF placement. Above-WAC sample material will be placed in SP-7 (or other designated above-WAC location). Archive soil samples will be disposed of within 30 days following regulatory agency approval of the remedial action plan for the A2PI NWUs and A2PII Part One soil. The location for disposition of these soils will be determined by the WAO Lead or designee.

Generation of decontamination waters will be minimized in the field. This water will be disposed of in a storm water collection basin that discharges to the Advanced Wastewater Treatment facility after

approval of the FEMP Wastewater Discharge Request. Contact waste generation will be minimized by limiting contact with sample media and by only using disposable materials which are necessary.

2.3 REAL-TIME MEASUREMENTS

Real-time data will be used to assess the need for additional physical sample locations or to adjust existing sample locations if necessary. Real-time surface measurements will be collected at Analytical Support Level (ASL) A and will require no data validation (refer to the SCQ for a definition of ASLs). The real-time radiation tracking system (RTRAK) is utilized for larger flat areas that are readily accessible. The radiation scanning system (RSS) is utilized for smaller areas, gradual slopes, or areas not accessible by the RTRAK. The high-purity germanium detector (HPGe) is utilized for areas that are inaccessible to both the RTRAK or RSS. A walkdown of the area by Characterization and/or RTIMP representatives may be required to determine the appropriate type of *in situ* gamma spectroscopy equipment needed. The decision to use any of these evaluation techniques will be made by the Characterization Lead and RTIMP Field Lead or their designees.

Real-time measurements will be taken in the areas within this investigation zone identified in Figure 2-2. These areas are based on accessibility and the location of previous special material excavations, proximity to the SWUs, and areas where RI/FS sampling indicated greater than FRL results.

2.3.1 RMS Data Acquisition

The RMS will be used to conduct a surface scan covering as close to 100 percent coverage as possible of the accessible area. The spectral acquisition time will be 4 seconds with data collected at a detector speed of 1 mile per hour (as determined by the on-board GPS). The RTRAK or RSS passes will typically be in a back and forth pattern after two perimeter passes have been completed. Alternatively, a circular pattern may be more appropriate. The RTRAK overlapping passes are achieved by placing the innermost tire track in the former outermost tire track from the previous passes, achieving an approximate 0.4-meter scanning overlap. Stakes or other markers may be used to keep the RSS on track. The RTRAK or RSS measurements will be accompanied by GPS northing and easting coordinates. GPS operations are described in Section 5.8 of the User's Manual.

The RTRAK or RSS will use a two-point running average (2 spectra average) to determine the trigger level of 1x the FRL for the following COCs: total uranium (1x FRL = 82 ppm), thorium-232 (1x FRL = 1.5 pCi/g), radium-226 (1x FRL = 1.7 pCi/g). If RTRAK or RSS scans indicate measurement results greater than 1x FRL for total uranium, thorium-232, or radium-226, the location of the above-trigger level measurements may be further investigated with HPGe measurements or physical sampling. This determination will be at the discretion of the Characterization Lead or designee. If confirmation and/or delineation measurements are collected, the data will be collected at ASL B and 10 percent will be validated.

2.3.2 HPGe Data Acquisition

If the HPGe detectors are used to conduct a surface scan, the data acquisition parameters will be a detector height of 1 meter and a spectral acquisition time of 15 minutes. If more than one HPGe measurement is required, the center of the measurements should be located nominally 11 meters (approximately 36 feet) apart to achieve 99.1 percent coverage (see User's Manual). The HPGe trigger level for characterization with 1 meter detector heights is 1x the FRL for the following COCs: total uranium (1x FRL = 82 ppm), thorium-232 (1x FRL = 1.5 pCi/g), radium-226 (1x FRL = 1.7 pCi/g). If the HPGe scans indicate measurement results greater than 1x FRL for total uranium, thorium-232 or radium-226, then the location of the above-trigger level measurements may be further investigated with physical sampling. This determination will be at the discretion of the Characterization Lead or designee.

HPGe measurements will be accompanied by GPS northing and easting coordinates. One duplicate HPGe measurement will be collected for every 20 HPGe measurements performed. The duplicate will be collected immediately after the initial measurement at the same acquisition time and detector height.

2.3.3 Surface Moisture Measurements

Surface moisture measurements are used to correct in situ RTIMP equipment gamma spectroscopy measurement data in order to report data on a dry weight basis prior to mapping. Surface moisture measurements will be collected with an in situ moisture measurement instrument (i.e., Troxler moisture gauge or Zeltex Infrared Moisture Meter) within eight hours of the collection of the gamma spectroscopy measurement data. Moisture measurements may be taken more frequently if ambient

weather or soil moisture conditions change or are expected to change, including watering for dust control. Field conditions, such as weather, will be noted on the applicable electronic field worksheet.

In addition, at least one surface moisture measurement will be collected for each area that is approximately 0.5 acre (100 feet by 200 feet) in size or smaller. More than one moisture measurement can be collected for each area if the surface moisture appears visibly different over the area. If a large difference in measurements is noted by the RTIMP Lead or designee, the data will be re-evaluated. One surface moisture measurement will be collected at each HPGe measurement location.

If conditions prevent the use of a field moisture instrument, a default moisture value of 20 percent (which will overcorrect data in dry conditions and undercorrect in wet conditions) may be used or a soil moisture core can be collected to a depth of 4 inches and submitted to the FEMP on-site laboratory for moisture analysis only. Field moisture measurements and moisture-corrected data are discussed in detail in Sections 3.8 and 5.2 of the User's Manual.

2.4 BACKGROUND RADON MONITORING

Background radon monitoring will be utilized during the collection of real-time measurements to obtain background radon information from the time data collection begins until after the final measurement is completed. The monitor will be placed in one location for the day where it will be set at the same height as the detector being used to collect the soil radiation measurements (RMS detector height = 31 cm). The background radon data will be used to correct the radium-226 data (per Section 5.3 of the User's Manual).

2.5 REAL-TIME DATA MAPPING

As the measurements are acquired by the Survey and RTIMP Teams, the data will be electronically loaded into mapping software through manual file transfer or Ethernet. A set of maps and/or data summaries will be given to the Characterization Lead or designee. Maps will be generated indicating radionuclide concentrations at geographic locations (northing and easting). The maps will depict the following:

- COC concentration maps depict total uranium, radium-226, and thorium-232 (two point running average) depicting 0.5x FRL, 1x FRL, 2x FRL, and 3x FRL concentrations. The total uranium concentration maps will also depict above-WAC concentrations, if present.
- HPGe location map color-coded field of view circles that are color coded for COC concentrations and denotes identification number for each HPGe measurement, including a data summary printout for each HPGe measurement.

2.6 TRACKING/MANAGING DATA COLLECTION

2.6.1 Physical Samples and Real-Time Measurements

All physical samples and real-time measurements will be assigned a unique alpha-numeric identification for data tracking purposes and will contain one or more of the following designators:

1. Area Designator:

Denotes physical sampling area or real-time measurement area:

A2P2-PT1 = Area 2, Phase II Part One

A2P1-NWU = Area 2, Phase I - Non-Waste Unit

Note:

A numerical "2, 1" is used in place of the roman numerals "II, I" for

data management purposes

2. Location Designator:

Physical sample number designates the sequential numbering of physical samples. The first sample taken is 1 and any subsequent

samples are numbered sequentially (2, 3, 4, etc.)

OR

Batch number designates the sequential numbering of batch runs that

are unique to each of the RMS systems

OR

HPGe measurement number designates the sequential numbering of HPGe measurements. The first measurement taken is 1 and any subsequent measurements are numbered sequentially (2, 3, 4, etc.).

3. Depth Interval

(if applicable):

Denotes depth interval in 12 inch increments, 1 (0 to 1 ft),

2 (1 - 2 ft), etc.

4. Measurement designator:

G = HPGe gamma measurement and associated moisture measurement

R = Lab analysis for radiological constituents

V = Archived sample

5. Quality control designators

(if necessary):

D = duplicate measurement

Using these guidelines, the unique identification scheme for each measurement technique is as follows:

RMS Measurement Identification: Use No. 1 and 2 designators above

Example: A2P1-NWU-684

where: A2P1-NWU = Area 2, Phase I Non-Waste Unit

684 = RTRAK batch #684

HPGe Measurement Identification: Use Nos. 1, 2, 4, 5 (if appropriate)

Example: A2P1-NWU-3-G-D

where: A2P1-NWU = Area 2, Phase I Non-Waste Unit

3 = third HPGe measurement taken in this area

G = HPGe gamma measurement

D = duplicate

Physical Sample Identification: Use Nos. 1, 2, 3, 4, and 5 (if appropriate)

Example: A2P2-PT1-4-2-R

where: A2P2 = Area 2, Phase II Part One

4 = fourth sample taken in this area 2 = 1 to 2 ft sample depth interval

R = radiological analysis

2.6.2 Radon Measurements:

Radon measurements will be collected and assigned a unique alpha-numeric identification

1. Prefix designating the area name: Denotes physical sampling area or real-time measurement area:

A2P1-NWU = Area 2, Phase I - Non-Waste Unit

2. Monitoring activity: RN = Radon monitoring

3. Detector Height: A = 1 meter

B = 31 cmC = 15 cm

4. Measurement Designator: Denotes sequential numbering of measurements (e.g., 1, 2, 3)

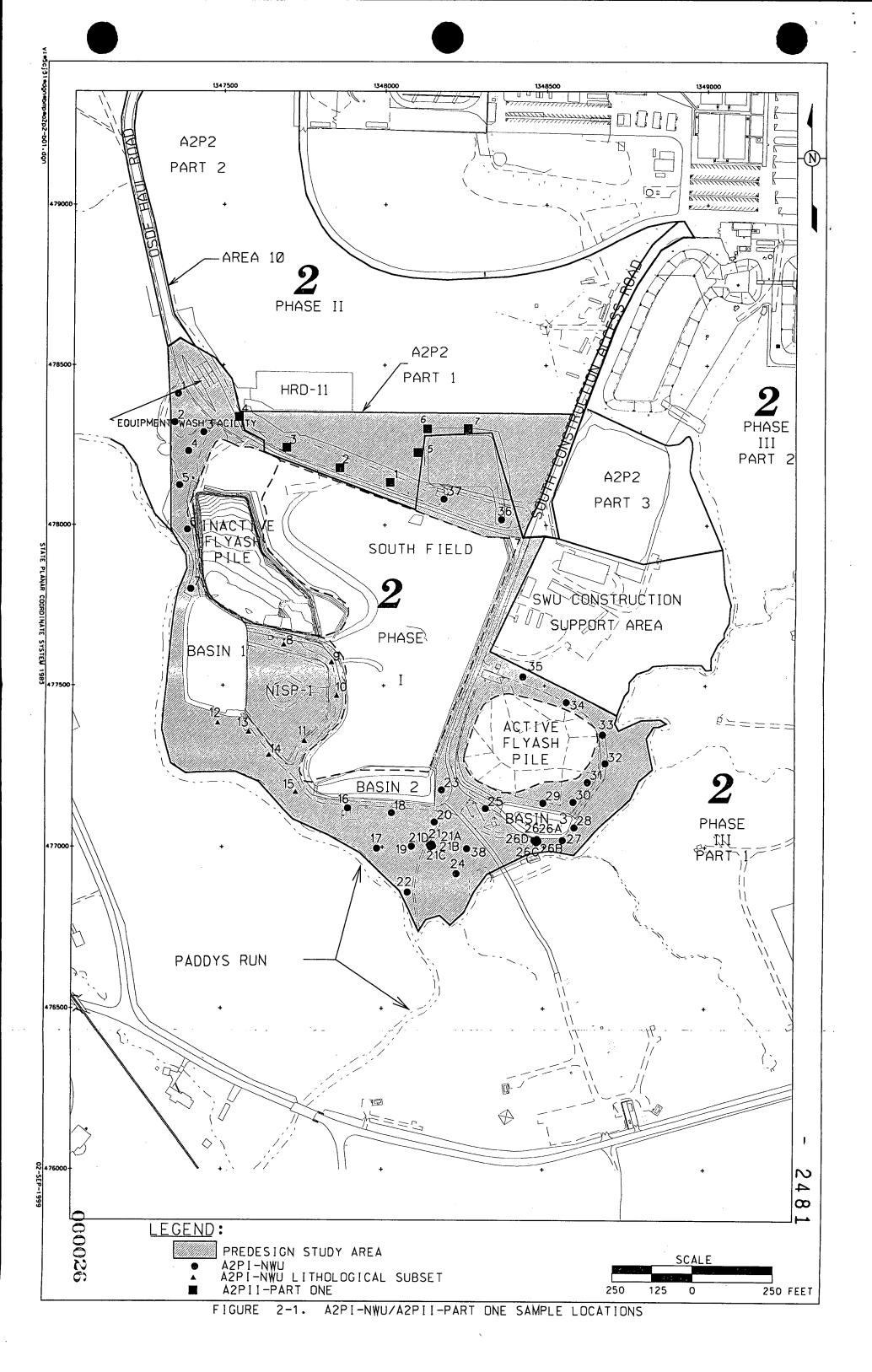
Example: A2P1-NWU-RN-A-1

where: A2P1-NWU = Area 2, Phase I Non-Waste Units

RN = Radon monitoring

A = 1 meter

1 = first radon monitoring event



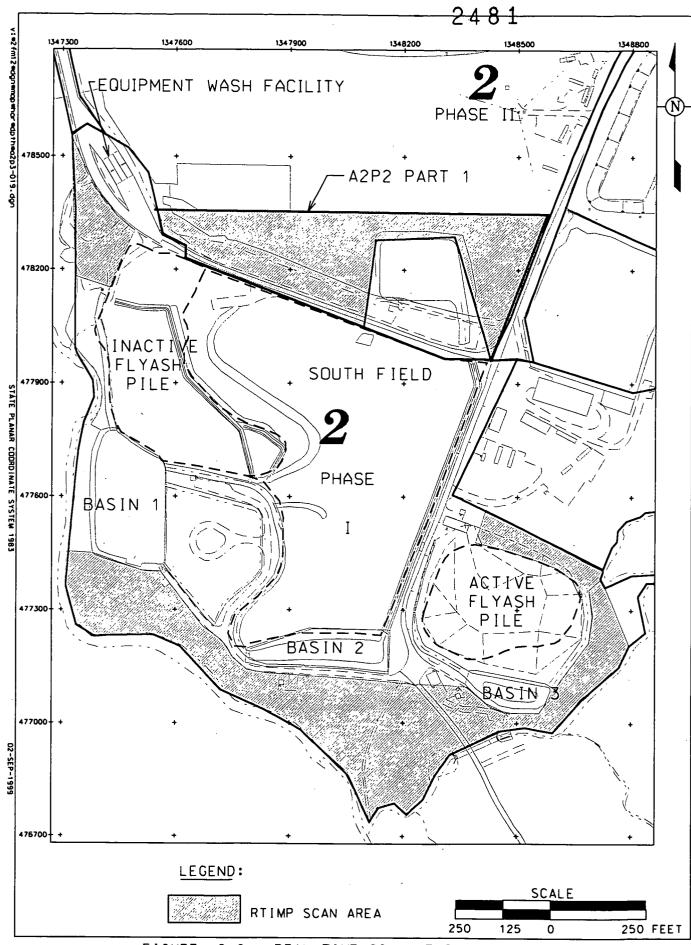


FIGURE 2-2. REAL-TIME SCAN MEASUREMENT AREA

3.0 SAMPLE ANALYSIS

All soil samples collected in A2PI-NWU and A2PII Part One [with the exception of A2P1-NWU-16 thru A2P1-NWU-30, A2P1-NWU-38, and their respective bounding points (A, B, C, D)] and submitted to the FEMP on-site laboratory will be analyzed for total uranium analysis with the sampling and analytical requirements listed in Table 3-1. Soil samples collected at point A2P1-NWU-16 thru A2P1-NWU-30, A2P1-NWU-38, and their respective bounding points (A, B, C, D) will be submitted to the FEMP on-site laboratory for analysis for total uranium, radium-226, radium-228, thorium-228, and thorium-232 with the sampling and analytical requirements listed in Table 3-1.

The necessary volume of all samples collected will be prepared for the appropriate analytical method per requirements of the SCQ. The TALs are shown in Table 3-1 and Appendix B. Data validation requirements are listed in Table 3-2.

If the Area Project Manager (APM) decides to analyze samples subject to methods not described in the SCQ, the APM shall ensure that:

- A V/FCN includes references confirming that the new method is sufficient to support data needs
- Variations from the SCQ methodology are documented in the PSP, or
- The APM may request data validation for affected samples or communicate to the lab that Data Qualifier Codes of J and R be attached to detected and nondetected COCs, respectively.

TABLE 3-1 SAMPLING AND ANALYTICAL REQUIREMENTS

Analyte	TAL	Method	Approximate Method Detection Limit	Preserve	ASL	Holding Time	Sample Mass
Total uranium	A, B	ICP/MS	1.0 ppm	None	В	12 months	300 g*
		Alpha Spec	0.6 ppm		В		
		Gamma Spec	5-6 ppm		E**		
Thorium-228 and	В	Alpha Spec	0.2 pCi/g	None	В	12 months].
Thorium-232		Gamma Spec	0.2 pCi/g				
Radium-226	В	Alpha Spec	0.6 pCi/g	None	В	12 months	
		Gamma Spec	0.6 pCi/g				
Radium-228	В	Alpha Spec	1.0 pCi/g	None	В	12 months	
		Gamma Spec	1.0 pCi/g				

A mass total of 300 grams is needed for analysis for each sample collected

TABLE 3-2 DATA VALIDATION REQUIREMENTS

ASL Level	Percent Validated
ASL A	No data validation required
ASL B	10 percent data validation required

^{**} ASL E due to higher detection limit; same lab QA/QC as ASL B applies to ASL E

4.0 QUALITY ASSURANCE REQUIREMENTS

Physical sampling and real-time data collection will be performed in accordance with the requirements in the latest revision of the SCQ. The DQO for physical sampling under this plan is DQO SL-048, Delineating the Extent of Constituents of Concern During Remediation Sampling, Rev. 5 and the DQO for real-time characterization is DQO SL-056, Rev. 0 (Appendix A).

4.1 SURVEILLANCE

Project management has the ultimate responsibility for the quality of the work processes and the results of the sampling/monitoring activities covered by this plan. The FEMP Quality Assurance (QA) organization may conduct independent assessments of the work processes and operations to assure the quality of performance. The assessment will encompass technical and procedural requirements of this PSP and the SCQ. Independent assessments may be performed by conducting surveillances.

4.2 IMPLEMENTATION OF FIELD CHANGES

If field conditions require changes or variances, verbal approval must be obtained from the Characterization Lead, WAO representative, RTIMP representative and QA representative or their designees before the changes can be implemented (electronic mail is acceptable as document approval). Changes to the PSP will be noted in the applicable Field Activity Logs and on a V/FCN. QA must receive the completed V/FCN, with the signatures of the Project Manager, Characterization Lead, WAO representative, RTIMP representative and the QA representative within seven working days of granting verbal approval.

5.0 SAFETY AND HEALTH

Personnel will conform to precautionary surveys by FEMP personnel representing the Utility Engineer, Industrial Hygiene, Occupational Safety, and Radiological Control.

All work performed on this project will be performed in accordance to applicable Environmental Monitoring project procedures, Radiological Control Requirements Manual (RM-0021), Safety Performance Requirements Manual, FDF work permit, radiological work permits, penetration permits, and other applicable permits. Concurrence with all applicable safety permits is required by all personnel in the performance of their assigned duties.

All personnel involved in the collection of soil samples will be briefed on this PSP and the briefing will be documented. Personnel who do not receive a briefing on these requirements will not participate in the execution of soil sampling activities related to the completion of assigned project responsibilities.

All emergencies shall be reported immediately on extension 911, or to the Site Communications Center at 648-6511 (if using a cellular phone), or using a radio and contacting "CONTROL" on Channel 11.

6.0 DATA MANAGEMENT

The RTIMP group will provide hard copy maps and/or summary reports to the Characterization Lead and Data Management Contact or designees. All Real-Time data collection will be collected and reported at a minimum ASL A and require no data validation. All physical samples and RTIMP confirmation/delineation measurements will be collected and reported at ASL B and will require 10 percent data validation. All electronically recorded field data will have the RMS or HPGe Data Verification Checklist (Section 5.4 of the User's Manual), which will be completed after each data collection event. Field documentation, such as the Nuclear Field Density/Moisture Worksheet, will undergo an internal review by the RTIMP.

Electronically recorded data from the GPS, HPGe, and RMS systems will be downloaded on a daily basis to disks, or to the Local Area Network (LAN) using the ethernet connection. The Characterization Lead or designee will be informed by the RTIMP Lead or designee when RTIMP equipment measurements do not meet data quality control checklist criteria. The Characterization Lead or designee will determine whether additional scanning, confirmation, or delineation measurements are required.

Once the survey and real-time electronic data have been placed on the LAN and SED, the Data Management Contact will perform an evaluation prior to placement on the Soil and Disposal Facility Project (SDFP) website. The evaluation may involve a comparison check between the electronic data, hard copy maps and summary reports for accuracy and completeness. The evaluation will be documented on the Real-Time Electronic Data Quality Control checklist (Figure 6-1), dated and signed.

Technicians and the field sampling data coordinator will review all field data for completeness and accuracy and then forward the data package to the Data Validation Contact for final review. The field data package will be filed in the records of the Environmental Management Project.

The Sample and Data Management organization will perform data entry into the SED for physical sampling and analytical results. After the sample data are in the SED, the Data Group Form

(FS-F-5157) will be completed by the Characterization Lead with concurrence from a WAO representative.

Copies of field documentation shall be generated and provided to the Characterization Lead or Data Management Contact upon request and maintained in SDFP project files until dispositioned to Engineering/Construction Document Control (ECDC). RTIMP will maintain all the real-time files and survey data will be maintained by the Survey Lead or designee. All records associated with this PSP should reference the PSP number and eventually be forwarded to ECDC to be placed in the project file.

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PSP/Project #:	
Batch Numbers:	
IPGe file Numbers	

REAL-TIME ELECTRONIC DATA QUALITY CONTROL CHECKLIST

	DATA QUALITY CONTROL CHECKLIST						
#	ITEM TO BE CHECKED	✓ or No	Modification/Correction with explanation	Date Corrected			
1	Receive the Characterization Request form, Monitoring Form (MF), coverage maps, real-time verification checklist, and/or HPGe parameter summary report from the Characterization field personnel						
2	Verify the signatures and all blanks on the MF are complete through Section 6 and complete on the Real-Time Verification Checklist			·			
3	Check loader to ensure the data transferred from the LAN to the SED (if the data files are in the SED, the loader is working properly)						
4	Check to ensure data transferred into the correct fields by looking at the data on the LAN in comparison with the data transferred to the SED (to verify this, all data fields for a few runs in each file will be reviewed)	·					
5	Check that the project number is correct and is consistent on the MF, the LAN, and the SED in both the worksheet files and the results/data files						
6	Check that the MF, the LAN, and the SED have the correct location identifier in both the worksheet files and the results/data files						
7	Check that worksheet on the LAN and in the SED have the correct elevation documented from the surveying group						
8	Verify northing and easting coordinates, look at the plotted map and the coordinates in the SED and verify the coordinates are within the boundary on the plotted map						
9	Check data files to ensure all files are received						
10	Attach this checklist and documentation for modifications to the EMF, initial and date all forms and documentation		×	×			
11	Insert USE into the "QC Field" on the SED after all this has been checked and verified correct		×	×			

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Sign	and	Date				
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PSP/Project #:	 		
Batch Numbers:	 	 	
HPGe file Numbers:			

- 1. If no, check with the Characterization Lead or designee to get needed forms.
- 2. If no, contact Characterization Lead and return MF to be completed and/or signed.
- 3. If no, check with SED Database Manager (ext. 7544) to find out why.
- 4. If no, check with the Real-Time Field Lead to see if any additional fields were added. If so, call SED Database Manager (ext. 7544) to have the field added into the SED tables. If not, check with SED Database Manager (ext. 7544) to see why the fields loaded incorrectly.
- 5. If no, verify the correct project number with the Characterization Lead and insert the project number into the worksheet on the LAN and the worksheet in the SED; attach the documentation to the form.
- 6. If no, verify with the Characterization Lead the correct identifier and correct the identifier both in the worksheet on the LAN and in the SED; attach the documentation to the form.
- 7. If no, check with the Surveying group to verify the elevation; If incorrect, change the elevation in the worksheet on the LAN and in the SED and attach the documentation to the form.
- 8. If no, check with Characterization Lead or designee to resolve the problem.
- 9. Run query in SED. The number of RTRAK/RSS files can be checked with the number of records (files) listed in the SRDIG directory under Real-Time Lab View files. No sequential gaps are anticipated; if gaps are found, check with the Real-Time Field Lead. The Real-Time Field Lead will verify gaps or will investigate to find out why the files are missing. For HPGe shots, an HPGe Data Verification Checklist is attached to the MF listing all the files. This Checklist can be used to ensure all the files were received in the SED.

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7.0 APPLICABLE DOCUMENTS, METHODS, AND STANDARDS

Excavation characterization activities described in this plan shall follow the requirements outlined in the following documents, procedures, and standard methods (including the latest revision of each document):

- A2PI Integrated Remedial Design Package (IRDP), which includes the A2PI SWUs Implementation Plan for OU2
- Sitewide Excavation Plan (SEP)
- WAC Attainment Plan for the OSDF
- Impacted Materials Placement Plan
- User Guidelines, Measurement Strategies, and Operational Factors for Deployment of In-Situ Gamma Spectroscopy at the Fernald Site (User's Manual)
- Sitewide Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Quality (SCQ) Assurance Project Plan
- In-Situ Gamma Spectroscopy Addendum to the Sitewide CERCLA Quality Assurance Project Plan
- Real-Time Instrumentation Measurement Program Quality Assurance Plan
- Delineating the Extent of Constituents of Concern During Remediation Sampling, DOO SL-048, Revision 5
- Real Time Final Remediation Level (FRL) Monitoring, DQO SL-056, Revision 0
- ADM-02 Field Project Prerequisites
- ADM-16 In-Situ Gamma Spectrometry Quality Control Measurement
- ADM-17 In-Situ Gamma Spectrometry Data Verification
- EP-0005 Controlling Aqueous Wastewater Discharges into Wastewater Treatment System
- EQT-05 Geodimeter 4000 Surveying System
- EQT-22 High Purity Germanium Detector In-Situ Efficiency Calibration
- EQT-23 High Purity Germanium Detectors

- EQT-32 Troxler 3440 Series Surface Moisture/Density Gauge
- EQT-33 Real-Time Differential Global Positioning System Operation
- EQT-39 Zeltex Infrared Moisture Meter
- EQT-41 Radiation Measuring Systems
- SMPL-01 Solids Sampling

APPENDIX A

DATA QUALITY OBJECTIVES SL-048, REV. 5 AND SL-056, REV. 0

Fernald Environmental Management Project

Data Quality Objectives

Title:

Delineating the Extent of Constituents of

Concern During Remediation Sampling

Number:

SL-048

Revision:

5

Effective Date: February 26, 1999

Contact Name: Eric Kroger

Approval: (signature on file)

Date: 2/25/99

James E. Chambers **DQO** Coordinator

Approval: (signature on file)

Date: 2/26/99

J.D. Chiou

SCEP Project Director

Rev. #	0	1	2	3	4	5	6
Effective Date:	9/19/97	10/3/97	4/15/98	6/17/98	7/14/98	2/26/99	

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DQO #: SL-048, Rev. 5 Effective Date: 2/26/99

DATA QUALITY OBJECTIVES

Delineating the Extent of Constituents of Concern During Remediation Sampling

Members of Data Quality Objectives (DQO) Scoping Team

The members of the DQO team include a project lead, a project engineer, a field lead, a statistician, a lead chemist, a sampling supervisor, and a data management lead.

Conceptual Model of the Site

Media is considered contaminated if the concentration of a constituent of concern (COC) exceeds the final remediation levels (FRLs). The extent of specific media contamination was estimated and published in the Operable Unit 5 Feasibility Study (FS). These estimates were based on kriging analysis of available data for media collected during the Remedial Investigation (RI) effort and other FEMP environmental characterization studies. Maps outlining contaminated media boundaries were generated for the Operable Unit 5 FS by overlaying the results of the kriging analysis data with isoconcentration maps of the other constituents of concern (COCs), as presented in the Operable Unit 5 RI report, and further modified by spatial analysis of maps reflecting the most current media characterization data. A sequential remediation plan has been presented that subdivides the FEMP into seven construction areas. During the course of remediation, areas of specific media may require additional characterization so remediation can be carried out as thoroughly and efficiently as possible. As a result, additional sampling may be necessary to accurately delineate a volume of specific media as exceeding a target level, such as the FRL or the Waste Attainment Criterion (WAC). Each individual Project-Specific Plan (PSP) will identify and describe the particular media to be sampled. This DQO covers all physical sampling activities associated with Predesign Investigations, precertification sampling, WAC attainment sampling or regulatory monitoring that is required during site remediation.

1.0 Statement of Problem

If the extent (depth and/or area) of the media COC contamination is unknown, then it must be defined with respect to the appropriate target level (FRL, WAC, or other specified media concentration).

2.0 Identify the Decision

Delineate the horizontal and/or vertical extent of media COC contamination in an area with respect to the appropriate target level.

3.0 Inputs That Affect the Decision

<u>Informational Inputs</u> - Historical data, process history knowledge, the modeled extent of COC contamination, and the origins of contamination will be required to

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establish a sampling plan to delineate the extent of COC contamination. The desired precision of the delineation must be weighed against the cost of collecting and analyzing additional samples in order to determine the optimal sampling density. The project-specific plan will identify the optimal sampling density.

<u>Action Levels</u> - COCs must be delineated with respect to a specific action level, such as FRLs and On-Site Disposal Facility (OSDF) WAC concentrations. Specific media FRLs are established in the OU2 and OU5 RODs, and the WAC concentrations are published in the OU5 ROD. Media COCs may also require delineation with respect to other action levels that act as remediation drivers, such as Benchmark Toxicity Values (BTVs).

4.0 The Boundaries of the Situation

<u>Temporal Boundaries</u> - Sampling must be completed within a time frame sufficient to meet the remediation schedule. Time frames must allow for the scheduling of sampling and analytical activities, the collection of samples, analysis of samples and the processing of analytical data when received.

<u>Scale of Decision Making</u> - The decision made based upon the data collected in this investigation will be the extent of COC contamination at or above the appropriate action level. This delineation will result in media contaminant concentration information being incorporated into engineering design, and the attainment of established remediation goals.

<u>Parameters of Interest</u> - The parameters of interest are the COCs that have been determined to require additional delineation before remediation design can be finalized with the optimal degree of accuracy.

5.0 Decision Rule

If existing data provide an unacceptable level of uncertainty in the COC delineation model, then additional sampling will take place to decrease the model uncertainty. When deciding what additional data is needed, the costs of additional sampling and analysis must be weighed against the benefit of reduced uncertainty in the delineation model, which will eventually be used for assigning excavation, or for other purposes.

6.0 <u>Limits on Decision Errors</u>

In order to be useful, data must be collected with sufficient areal and depth coverage, and at sufficient density to ensure an accurate delineation of COC concentrations. Analytical sensitivity and reproducibility must be sufficient to differentiate the COC concentrations below their respective target levels.

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Types of Decision Errors and Consequences

<u>Decision Error 1</u> - This decision error occurs when the decision maker determines that the extent of media contaminated with COCs above action levels is not as extensive as it actually is. This error can result in a remediation design that fails to incorporate media contaminated with COC(s) above the action level(s). This could result in the re-mobilization of excavation equipment and delays in the remediation schedule. Also, this could result in media contaminated above action levels remaining after remediation is considered complete, posing a potential threat to human health and the environment.

<u>Decision Error 2</u> - This decision error occurs when the decision maker determines that the extent of media contaminated above COC action levels is more extensive than it actually is. This error could result in more excavation than necessary, and this excess volume of materials being transferred to the OSDF, or an off-site disposal facility if contamination levels exceed the OSDF WAC.

<u>True State of Nature for the Decision Errors</u> - The true state of nature for Decision Error 1 is that the maximum extent of contamination above the FRL is more extensive than was determined. The true state of nature for Decision Error 2 is that the maximum extent of contamination above the FRL is not as extensive as was determined. Decision Error 1 is the more severe error.

7.0 Optimizing Design for Useable Data

7.1 Sample Collection

A sampling and analytical testing program will delineate the extent of COC contamination in a given area with respect to the action level of interest. Existing data, process knowledge, modeled concentration data, and the origins of contamination will be considered when determining the lateral and vertical extent of sample collection. The cost of collecting and analyzing additional samples will be weighed against the benefit of reduced uncertainty in the delineation model. This will determine the sampling density. Individual PSPs will identify the locations and depths to be sampled, the sampling density necessary to obtain the desired accuracy of the delineation, and if samples will be analyzed by the on-site or offsite laboratory. The PSP will also identify the sampling increments to be selectively analyzed for concentrations of the COC(s) of interest, along with field work requirements. Analytical requirements will be listed in the PSP. The chosen analytical methodologies are able to achieve a detection limit capable of resolving the COC action level. Sampling of groundwater monitoring wells may require different purge requirements than those stated in the SCQ (i.e., dry well definitions or small purge volumes). In order to accommodate sampling of wells that go dry prior to completing the purge of the necessary well volume, attempts to sample the

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monitoring wells will be made 24 hours after purging the well dry. If, after the 24 hour period, the well does not yield the required volume, the analytes will be collected in the order stated in the applicable PSP until the well goes dry. Any remaining analytes will not be collected. In some instances, after the 24 hour wait the well may not yield any water. For these cases, the well will be considered dry and will not be sampled.

7.2 COC Delineation

The media COC delineation will use all data collected under the PSP, and if deemed appropriate by the Project Lead, may also include existing data obtained from physical samples, and if applicable, information obtained through real-time screening. The delineation may be accomplished through modeling (e.g. kriging) of the COC concentration data with a confidence limit specific to project needs that will reduce the potential for Decision Error 1. A very conservative approach to delineation may also be utilized where the boundaries of the contaminated media are extended to the first known vertical and horizontal sample locations that reveal concentrations below the desired action level.

7.3 QC Considerations

Laboratory work will follow the requirements specified in the SCQ. If analysis is to be carried out by an off-site laboratory, it will be a Fluor Daniel Fernald approved full service laboratory. Laboratory quality control measures include a media prep blank, a laboratory control sample (LCS), matrix duplicates and matrix spike. Typical Field QC samples are not required for ASL B analysis. However the PSPs may specify appropriate field QC samples for the media type with respect to the ASL in accordance with the SCQ, such as field blanks, trip blanks, and container blanks. All field QC samples will be analyzed at the associated field sample ASL. Data will be validated per project requirements, which must meet the requirements specified in the SCQ. Project-specific validation requirements will be listed in the PSP.

Per the Sitewide Excavation Plan, the following ASL and data validation requirements apply to all soil and soil field QC samples collected in association with this DQO:

• If samples are analyzed for Pre-design Investigations and/or Precertification, 100% of the data will be analyzed per ASL B requirements. For each laboratory used for a project, 90% of the data will require only a Certificate of Analysis, the other 10% will require the Certificate of Analysis and all associated QA/QC results, and will be validated to ASL B. Per Appendix H of the SEP, the minimum detection level (MDL) for these analyses will be established at approximately 10% of the action level (the action level for precertification is the

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FRL; the action level for pre-design investigations can be several different action levels, including the FRL, the WAC, RCRA levels, ALARA levels, etc.). If this MDL is different from the SCQ-specified MDL, the ASL will default to ASL E, though other analytical requirements will remain as specified for ASL B.

- If samples are analyzed for WAC Attainment and/or RCRA Characteristic Areas Delineation, 100% of the data will be analyzed and reported to ASL B with 10% validated. The ASL B package will include a Certificate of Analysis along with all associated QA/QC results. Total uranium analyses using a higher detection limit than is required for ASL B (10 mg/kg) may be appropriate for WAC attainment purposes since the WAC limit for total uranium is 1,030 mg/kg. In this case, an ASL E designation will apply to the analysis and reporting to be performed under the following conditions:
 - all of the ASL B laboratory QA/QC methods and reporting criteria will apply with the exception of the total uranium detection limit
 - the detection limit will be ≤10% of the WAC limit (e.g., ≤103 mg/kg for total uranium).
- If delineation data are also to be used for certification, the data must meet the data quality objectives specified in the Certification DQO (SL-043).
- Validation will include field validation of field packages for ASL B or ASL D data.

All data will undergo an evaluation by the Project Team, including a comparison for consistency with historical data. Deviations from QC considerations resulting from evaluating inputs to the decision from Section 3, must be justified in the PSP such that the objectives of the decision rule in Section 5 are met.

7.4 Independent Assessment

Independent assessment shall be performed by the FEMP QA organization by conducting surveillances. Surveillances will be planned and documented in accordance with Section 12.3 of the SCQ.

7.5 <u>Data Management</u>

Upon receipt from the laboratory, all results will be entered into the SED as qualified data using standard data entry protocol. The required ASL B, D or E data will undergo analytical validation by the FEMP validation team, as required (see Section 7.3). The Project Manager will be responsible to determine data usability as it pertains to supporting the DQO decision of determining delineation of media

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COC's.

7.6 Applicable Procedures

Sample collection will be described in the PSP with a listing of applicable procedures. Typical related plans and procedures are the following:

- Sitewide Excavation Plan (SEP)
- Sitewide CERCLA Quality Assurance Project Plan (SCQ).
- SMPL-01, Solids Sampling
- SMPL-02, Liquids and Sludge Sampling
- SMPL-21, Collection of Field Quality Control Samples
- EQT-06, Geoprobe® Model 5400 Operation and Maintenance
- EQT-23, Operation of High Purity Germanium Detectors
- EQT-30, Operation of Radiation Tracking Vehicle Sodium Iodide Detection System

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Data Quality Objectives Delineating the Extent of Constituents of Concern During Remediation Sampling

1A.	Task/Description: Delineating the extent of contamination above the FRLs				
1.B.	Project Phase: (Put an X in the appropriate selection.)				
	RI S RD RA RA OTHER				
1.C.	DQO No.: SL-048, Rev. 5 DQO Reference No.:				
2.	Media Characterization: (Put an X in the appropriate selection.)				
	Air Biological Groundwater X Sediment X Soil				
	Waste Wastewater Surface water Other (specify)				
3.	Data Use with Analytical Support Level (A-E): (Put an X in the appropriate Analytical Support Level selection(s) beside each applicable Data Use.)				
	Site Characterization Risk Assessment A B C D E C				
	Evaluation of Alternatives Engineering Design A B C D E A B C D K E K				
	Monitoring during remediation Other A X B X C D X E X A B C D E				
4.A.	Drivers: Remedial Action Work Plans, Applicable or Relevant and Appropriate Requirements (ARARs) and the OU2 and/or OU5 Record of Decision (ROD).				
4.B.	Objective: Delineate the extent of media contaminated with a COC (or COCs) with respect to the action level(s) of interest.				
5.	Site Information (Description):				

6.A.	the type of analysis or analyses required	nt of the appropriate box or boxes selecting
	Temperature Specific Conductance Dissolved Oxygen	Iranium X
	4. Cations	X * 6. Other (specify) X * Cides X * X *
	*If constituent is identified for deline	ation in the individual PSP.
6.B.	Equipment Selection and SCQ Reference	: :
	Equipment Selection	Refer to SCQ Section
	ASL A	SCQ Section:
	ASL B X	SCQ Section: App. G Tables G-1&G-3
	ASL C	SCQ Section:
	ASL D X	SCQ Section: App. G Tables G-1&G-3
	ASL E X (See sect. 7.3, pg. 6)	SCQ Section: App. G Tables G-1&G-3
7.A.	Sampling Methods: (Put an X in the app	ropriate selection.)
	Biased X Composite Env	ironmental K Grab K Grid K
	Intrusive Non-Intrusive	Phased Source
	DQO Number: SL-048, Rev. 5	

_	#: SL-048, Rev. 5 — 2 4 8 1 Page 10 of 10 ive Date: 2/26/99							
7.B.	Sample Work Plan Reference: This DQO is being written prior to the PSPs.							
	Background samples: OU5 RI							
7.C.	Sample Collection Reference:							
	Sample Collection Reference: SMPL-01, SMPL-02, EQT-06							
8.	Quality Control Samples: (Place an "X" in the appropriate selection box.)							
8.A.	Field Quality Control Samples:							
	Trip Blanks Field Blanks Equipment Rinsate Samples Preservative Blanks Other (specify) X * Container Blanks Duplicate Samples X * ** Duplicate Samples X * ** Purplicate Samples X * ** Performance Evaluation Samples Other (specify)							
	 For volatile organics only Split samples will be collected where required by EPA or OEPA. If specified in PSP. Collected at the discretion of the Project Manager (if warranted by field conditions) One per Area and Phase Area per container type (i.e. stainless steel core liner/plastic core liner/Geoprobe tube). 							
8.B.	Laboratory Quality Control Samples: Method Blank Matrix Duplicate/Replicate Surrogate Spikes Tracer Spike Other (specify) Per SCO							
	Other (specify) Per SCQ							
9.	Other: Please provide any other germane information that may impact the data quality or gathering of this particular objective, task or data use.							

Fernald Environmental Management Project

Data Quality Objectives

Title:

Real Time Final Remediation Level (FRL)

Monitoring

Number:

SL-056

Revision:

Effective Date: 9/01/99

Contact Name: Joan White

DOO Coordinator

Approval:

Real-Time Instrumentation Measurement

Program Manager

Rev. #	0			
Effective Date:	9/01/99			

Data Quality Objectives Real Time Final Remediation Level (FRL) Monitoring

1.0 Statement of Problem

Conceptual Model of the Site

The general soil remediation process at the Fernald Environmental Management Project (FEMP) includes real-time *in-situ* gamma spectrometry (real-time) measurements and physical sampling during different phases of the remediation process. Initially, pre-design investigations define excavation boundaries. During excavation, real-time measurements and/or sampling for waste disposition issues occurs. After planned excavations are complete, real-time measurements and/or physical sampling precertification activities are carried out to verify that residual contamination is below final remediation levels (FRLs).

This DQO describes the real-time in-situ gamma spectrometry methods used for gamma resolvable Area Specific Contaminants of Concern (ASCOC) FRL monitoring to support remedial design and precertification. Any physical soil samples collected to support remedial design will be collected under a separate DQO. Real-time FRL measurements involve field surveys of the surface soil using mobile and stationary gamma-discernable real-time equipment. Real-time FRL measurements are collected within an area when above-FRL radiological contamination is anticipated to be minimal based on process knowledge or previous investigations.

FRL scanning activities must follow the guidelines established in the Sitewide Excavation Plan (SEP) and the most current version of the document User Guidelines, Measurement Strategies, and Operational Factors for Deployment of In-Situ Gamma Spectrometry at the Fernald Site (hereinafter referred to as the Real Time Users Manual). As discussed in these documents, FRL measurements are conducted in two separate activities:

- FRL Phase I includes a mobile sodium iodide (NaI) detector scan of as much of the area as accessible at a 31 cm detection height at 1 mile per hour. If parts of the area of interest are inaccessible to the mobile NaI detectors, then the stationary High Purity Germanium (HPGe) detector will be used to obtain measurements in those areas. Target parameters for FRL Phase I NaI measurements are gross gamma activity and 3-times the FRL (3x FRL) values of total uranium, radium-226 and/or thorium-232, as calculated by a moving two-point average of consecutive measurements, or as indicated by 2x FRL in single measurements using the HPGe detectors at a 1 meter detector height.
- FRL Phase II includes stationary HPGe "hot spot evaluation" measurements at Phase I locations where the two-point average of total uranium, radium-226 and/or thorium-232 has identified resolvable ASCOC concentrations

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greater than 3-times the FRL (3x FRL) using the RMS systems, or where single HPGe measurement from Phase I are greater than 2x FRL. Target parameters for FRL Phase II are all gamma resolvable radiological ASCOCs.

Available Resources

<u>Time</u>: FRL investigation of remediation areas or phased areas must be accomplished by the field team of real-time instrumentation operators (and samplers if necessary), to provide required information in time to support the design effort.

<u>Project Constraints:</u> FEMP remediation activities are being performed in support of the Accelerated Remediation Plan, and soil remediation activities must be consistent with the SEP. FRL scanning, and if necessary, sampling and analytical testing, must be performed with existing manpower and instrumentation, considering instrument availability, to support the remediation and certification schedule. The results of FRL Phase I will determine Phase II HPGe measurement location and if necessary, will determine physical sample location. Design and execution of potential remediation is dependent on successful completion of this work.

<u>Instrumentation</u>: Real-time monitoring includes mobile sodium iodide (Nal) systems referred to as the Radiation Measurement Systems (RMS). In addition, stationary germanium detectors mounted on a tripod (the HPGe), are also used. These instruments can significantly accelerate the pace of necessary characterization by detecting soil contaminated with gamma resolvable radiological ASCOCs in a rapid and non-intrusive manner.

2.0 <u>Identify the Decision</u>

Decision

Delineate the horizontal extent of above-FRL (hot spot criteria) radiological contamination in the area soil. In addition, determine the need for Phase II real-time measurements to further assist in the above-FRL delineation.

3.0 Identify Inputs That Affect the Decision

Required Informational Input

Real-time FRL measurements will be used to estimate the surface soil contamination and the variation in surface soil contamination in areas scheduled for design, modeling, precertification, or certification activities. In addition, RTIMP data may be used to determine physical sampling collection location and/or a review of existing physical sample data, process knowledge, or visible observation.

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Sources of Informational Input

FRL measurements for gamma discernible radiological COCs will involve measurements from mobile and stationary in-situ gamma spectrometry equipment. Physical samples may be collected to verify real-time measurements, or to investigate non-gamma resolvable ASCOCs.

Action Levels

FRLs established in the OU2 and OU5 Records of Decision are specific for radiological COC, and in some cases, vary between remediation areas. The FRLs were developed to account for health risks, cross media impact, background concentrations, and applicable or relevant and appropriate requirements (ARARs) and represent not-to-exceed contaminant-specific average soil concentrations. Real-time HPGe measurements may also be taken to support excavation to ALARA requirements. Physical samples may be used to verify HPGe readings and to precertify for non-gamma resolvable ASCOCs.

The 3x FRL concentrations/activities obtained through two-point averaging of mobile Nal measurements have been developed based on the ability of the instrumentation to resolve these levels. Refer to the Real-Time User's Manual for additional details.

Methods of Data Collection

FRL Phase I measurements will be utilized to obtain as close to complete coverage of the areas of concern. Hot spot confirmation and delineation measurements will be obtained during FRL Phase II by strategically placed stationary HPGe measurements. Analysis and data management for FRL Phase I data will be conducted at ASL A. FRL Phase II data may be conducted at either ASL A or ASL B, at the discretion of the Project. The decision to collect Phase II data at ASL A, or ASL B will depend on the Project's need for validated data. Only ASL B data is subject to validation, at project request. Real-time data collection for Phase II ASL A and ASL B measurements are identical. All measurements will be performed in compliance with operating procedures, the Real-Time User's Manual, the SEP, and the SCQ.

The FRL Phase I data will be utilized to establish general radiological concentration patterns and detect areas of elevated total gamma activity, as well as provide isotopic information for resolvable ASCOCs. The FRL Phase II HPGe gamma detectors will be used to confirm and delineate Phase I potential hot spot measurements, as needed. All real-time Phase I and Phase II measurements will be collected in accordance with the procedures identified in Section 7.0 of this DQO.

Surface physical samples may be collected to verify HPGe measurements for

non-gamma resolvable ASCOCs. If physical sampling is needed, it will be identified in PSPs. The data quality of these samples will be consistent with the latest sampling DQO.

4.0 The Boundaries of the Situation

Spatial Boundaries

Domain of the Decision: Boundaries are limited to surface soils of areas planned for certification, and adjacent areas, as defined in the individual work plans.

Population of Soils: The soils affected are surface soils (to a nominal depth of 6 inches), which include recently excavated surfaces and undisturbed soils associated with excavation areas as designated in the individual work plans.

Temporal Boundaries

Time Constraints on Real-Time Measurements: The scheduling of FRL scanning is closely associated with the design process and excavation schedule. FRL real-time scanning must be conducted prior to design, excavation, if any, and before certification activities begin. The scanning data must be returned and processed into useable format in time for the information to be useful within the current remediation schedule.

Practical Considerations: In-situ gamma spectrometry measurements cannot be made during snow coverage or standing water conditions or during precipitation. Field analytical methods should also be limited to unsaturated soils. Most areas undergoing scanning are flat, open terrain, and are readily accessible to the equipment. Some areas may require preparation, such as cutting of grass or removal of undergrowth, fencing and other obstacles. In situ measurements will require coordination with appropriate maintenance personnel for site preparation. Physical and environmental parameters will be recorded and assessed during data collection. Refer to the Real-Time User's Manual for additional details.

5.0 <u>Develop a Logic Statement</u>

Parameters of Interest

For FRL Phase I, parameters of interest are gross gamma activity and 3-times the FRL values of total uranium, radium-226 and thorium-232, as calculated by a moving two-point average of consecutive readings. For FRL Phase II, parameters of interest are all HPGe-discernable radiological ASCOCs.

FRL Target Levels

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For FRL Phase I, target levels are the highest gross gamma activity readings, 3x FRL for total uranium, radium-226 and thorium-232, and WAC trigger levels for total uranium. For FRL Phase II, target levels are the FRLs of all gamma discernable radiological ASCOCs including the WAC trigger level for total uranium.

Decision Rules

Following FRL Phase I, any Phase I Nal scanned areas exhibiting patterns of high gross gamma activity will be measured with the HPGe. Also, any Phase I HPGe measurements greater than 3x FRL will be scanned with the HPGe for hot spot evaluation per section 3.3 of the Real-Time User's Manual.

Following FRL Phase II, if HPGe results indicate an area could fail FRLs, the soil may be evaluated further with additional HPGe measurements or physical samples, or undergo remedial excavations. If remedial excavations are performed, the excavated area will be measured with post-excavation HPGe measurements to ensure removal of the contamination. Once the remediation is complete, FRL attainment is confirmed by the HPGe.

6.0 Establish Constraints on the Uncertainty of the Decision

Range of Parameter Limits

The range of surface soil concentrations anticipated will be from background (natural concentrations) to greater than 3X FRL.

Types of Decision Errors and Consequences

Decision Error 1: This decision error occurs when the decision maker decides an area meets FRLs when the average soil concentration in an area is above the FRL, or the soil contains ASCOC concentrations above the hot spot criteria (3x FRL for hot spots $\leq 10~\text{m}^2$, or 2x FRL for hot spots $> 10~\text{m}^2$). This decision error would lead to the area failing certification for average radiological COC concentrations above the FRL or for hot spot criteria. If an area fails certification sampling and analytical testing, remobilization and further excavation, precertification, and certification sampling would be necessary.

Decision Error 2: This decision error occurs when the decision maker decides that additional HPGe and/or physical samples are necessary based on FRL Phase II results; or the decision maker directs the excavation (or additional excavation) of soils, when they actually have average radiological COC concentrations below the FRLs and no ASCOC hot spots (3x FRL for hot spots ≤ 10 m², or 2x FRL for hot spots ≥ 10 m²). This would result in added sampling and analytical costs and/or added costs due to the excavation of clean soils and an increased volume in the OSDF. This is not as severe as Decision Error 1. The addition of clean soil to the

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OSDF would result in further reduction, although minimally, to human health risk in the remediated areas.

True State of Nature for the Decision Errors

The true state of nature for Decision Error 1 is that the actual concentrations of radiological ASCOCs are greater than their FRLs and/or the hot spot criteria. The true state of nature for Decision Error 2 is that the true concentrations of COCs are below their FRLs and/or hot spot criteria. Decision Error 1 would be the more severe error.

7.0 Optimize a Design for Obtaining Quality Data

As discussed in Section 3.3.3 of the SEP, FRL scanning consists of two separate activities. Refer to Section 1.0 of this DQO for a general overview of FRL Phase I and FRL Phase II activities.

Real-time measurements are generated by two methods: 1) the mobile sodium iodide (NaI) detection systems which provide semi-quantitative radiological data, and 2) the stationary high purity germanium (HPGe) system that provides quantitative measurements of radiological COCs. If necessary, physical samples may also be collected for HPGe data verification, and to precertify for non-gamma resolvable ASCOCs.

Surface moisture readings are obtained in conjunction with Phase I and Phase II the NaI and HPGe system measurements using the Troxler nuclear moisture and density gauge or the Zeltex moisture meter. If conditions do not permit the use of the moisture meters, a soil moisture sample may be collected and submitted to the onsite laboratory for percent moisture analysis, or a default moisture value of 20% may be used. The soil moisture data will be used as is discussed in Sections 3.8, 4.11 and 5.2 of the Real-Time User's Manual. The gamma data will be corrected to a dry weight equivalent.

Background radon monitoring will also occur in conjunction with Phase I and Phase II NaI and HPGe system measurements, as specified in the PSP. Refer to the Section 5.3 of the Real-Time User's Manual for a discussion on radium-226 corrections.

Sodium Iodide (Nal) System

The mobile Nal detector systems are collectively called the Radiation Measurement Systems (RMS). They are used to achieve as close to complete coverage of the area as possible, taking into consideration the topographic and vegetative constraints which limit access. The Nal systems currently are used to obtain measurements over an area specified in a PSP to detect radiological total activity

patterns and elevated radiological activity. The Nal detector systems are used at a 31 cm detector height at 1 mph for a 4 second acquisition with a 0.4 meter overlap, and are consistent with the Real-time User's Manual. If the total uranium FRL is 20 ppm or lower, the Nal systems should not be used for FRL attainment, the HPGe system should be used.

The mobile Nal systems are electronically coupled with a global positioning system (GPS) rover and base unit to record each measurement location. Counting and positioning information is recorded continuously on a field personal computer (PC) and stored on disk or hard drive for future downloading on the site soil database and Graphical Information System (GIS) system, or transferred directly to the Local Area Network (LAN) by Ethernet.

Information from the NaI/GPS system is recorded on the PC and transferred to the Unix system through the local area network on a regular (at least daily) basis. The information is plotted on the FEMP GIS system, or in the field using Surfer software. With the output, patterns of elevated total activity, and locations of elevated concentrations can be identified.

Data reduction is an important aspect of Nal system data use. Individual total uranium, radium-226 and thorium-232 concentrations will undergo two-point averaging. The two-point averaged values will be mapped and evaluated with respect to 3x FRL.

Nal measurements may be used for design, excavation during remediation, and precertification decision making if the measurements clearly indicate below FRL criteria have been met. They may also be used to determine the location and number of FRL Phase II HPGe measurements, if required.

In-Situ HPGe Detectors

The HPGe detector is used during FRL Phase I or FRL Phase II, as follows:

- During FRL Phase I, the HPGe is used in areas where topographic or vegetative constraints prevent mobile Nal detector access or if the Nal systems are out of service. The HPGe is used in a 99.1% coverage grid over the accessible area. Detector height is 1 meter with a count time of 15 minutes.
- During FRL Phase II, the HPGe detector is used at strategic locations
 established thorough the FRL Phase I screening. These locations are where
 the highest readings of gross gamma activity were identified and/or where
 individual ASCOC concentrations were identified as hot spots. The HPGe is
 used to identify radiological COC levels, which in turn provide information
 concerning the ability to pass FRLs. The number of Phase II HPGe

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measurements to delineate the hot spot boundary varies based on the size of extent of contamination. If the area potentially exceeding the 2x FRL or 3x FRL exhibits a visible contamination boundary, the Project may determine that Phase II measurements may not need to be collected.

Physical Soil Sampling

Physical samples may be collected and analyzed for target radiological COCs to verify the HPGe measurements and/or to precertify for non-gamma discernable ASCOCs. If physical samples are required, they will be collected in compliance with the applicable sampling DQO. Criteria for obtaining physical samples, such as sample density, will be specified in the PSP, if necessary. The minimum data quality acceptable for this purpose will be identified in the applicable sampling DQO. Field QC, ASL and Validation requirements will be consistent with the SCQ and SEP requirements.

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Data Quality Objectives Real Time FRL Measurements

1A. 1B.	Task/Description: FRL real-time measurements. Project Phase: (Put an X in the appropriate selection.)							
	RI FS RD RA RA OTHER							
1.C.	DQO No.: SL-056, Rev. 0 DQO Reference No.: Current Sampling DQO							
2.	Media Characterization: (Put an X in the appropriate selection.)							
	Air Biological Groundwater Sediment Soil							
	Waste Wastewater Surface water Other (specify)							
3.	Data Use with Analytical Support Level (A-E): (Put an X in the appropriate Analytical Support Level selection(s) beside each applicable Data Use.)							
	Site Characterization A B B C D E A B C D E							
	Evaluation of Alternatives A B C D E A B C D E E							
	Monitoring during remediation activities Other: Precertfication A X B X C D E A B X C D E E							
4.A.	Drivers: Applicable or Relevant and Appropriate Requirements (ARARs), Operable Unit 5 Record of Decision (ROD), the Real-Time User's Manual, the Sitewide Excavation Plan and the Project-Specific Plan (PSP).							
4.B.	Objective: To determine if the area of interest is likely to pass FRLs for all HPGe discernable radiological COCs							
5. 5	Site Information (Description): The OU2 and OU5 RODs have identified areas at the							

FEMP that require remediation activities. The RODs specify that the soils in these

areas will be clean and demonstrated to be below the FRLs.

6.A.	Refere	Types with appropriat ence: (Place an "X" to of analysis or analyses nalysis if appropriate.	the rig	ght of the	he appr en seled	opriate	box or type of	boxes selec equipment to	ting the o perform
	1.	pH Temperature Spec.Conductance Dissolved Oxygen Technetium-99		2.	Uraniu Full Ra Metals Cyanic Silica	ıd.	X *	3. BTX TPH Oil/Grease	
	4. * If s	Cations Anions TOC TCLP CEC COD pecified in the PSP for	or Nal a	5. nd HPG	VOA ABN Pestici PCB		ad's.	6. Other (sp Percent N	
6.B.	Equip	ment Selection and S	CQ Re	ference	:			•	·
	Equip	ment Selection				Refer	to SCC	2 Section	
	ASL A	A Mobile Nal, HPGe	and HI	PGe*		sco	Section	: Not Applica	able
	ASL E	B <u>HPGe*</u>		·		sco	Section	: <u>App. G</u> ,	Table 1
	ASL (c				sca	Section	n:	
	ASL I	D				sco	Section	n:	
	ASL I	E				sca	Section	n:	
	* Choosing the ASL level for Phase II FRL HPGe measurements is at the discretion of the project considering the project need for validated data.						on of the		

7.A. Sampling Methods: (Put an X in the appropriate selection.)

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	Biased Composite Environmenta		Grab X	Grid 🗓
•	Intrusive Non-Intrusive Phased	Sour	се	
7.B.	Sample Work Plan Reference: The DQO is be the Project-Specific Plans. Background samples: <u>OU5 RI/FS</u>	eing estal	blished prior t	o completion of
7.C.	Sample Collection Reference: -EQT-22, Characterization of Gamma Sensitive-EQT-23, Operation of High Purity Germanium-EQT-32, Troxler 3440 Series Surface Moisture-EQT-33, Real Time Differential Global Positive-EQT-39, Zeltex Infrared Moisture Meter-EQT-40, Satloc Real-time Differential Global-EQT-41, Radiation Measurement Systems-ADM-16, In-Situ Gamma Spectrometry Qualiford Guidelines, Measurement Strategies, and of In-Situ Gamma Spectrometry at the Fernal	n Detectore Gauge oning Systems Positions of Contract	ors e stem ing System rol tional Factors	
8.	Quality Control Samples: (Place an "X" in the	e appropi	riate selection	box.)
8.A.	Field Blanks Equipment Rinsate Samples Du Sp	ntainer B plicate S lit Sampl Samples	amples es	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
8.B.	Laboratory Quality Control Samples:			
		atrix Dup Irrogate S	licate/Replicat Spikes	re 🔲
9.	Other: Please provide any other germane infi			act the data

APPENDIX B

PREDESIGN SAMPLING TARGET ANALYTE LISTS

APPENDIX B PREDESIGN SAMPLING TARGET ANALYTE LISTS -- 2481

TAL 20400-PSP-0002-A ICP/MS Method (ASL B)

Analyte	Method	FRL limit	MDC
Total Uranium	ICP/MS or	82 ppm	8 ppm
	Alpha/Gamma		
	Alpha/Gamma Spectroscopy		•

TAL 20400-PSP-0002-B ICP/MS and Alpha or Gamma Spectroscopy Method (ASL B)

Analyte	Method	FRL limit	MDC
Total Uranium	ICP/MS	82 ppm	8 ppm
Thorium-228	Alpha or Gamma Spectroscopy	1.7 pCi/g	.17 pCi/g
Thorium-232	Alpha or Gamma Spectroscopy	1.5 pCi/g	.15 pCi/g
Radium-226	Alpha or Gamma Spectroscopy	1.7 pCi/g	.17 pCi/g
Radium-228	Alpha or Gamma Spectroscopy	1.8 pCi/g	.18 pCi/g